

## FEDERAL SUBRECIPIENT AND VENDOR DETERMINATION CHECKLIST

<b>Contract Number:</b> _____	<b>Prepared by:</b> _____
<b>CFDA Number:</b> _____	<b>Date:</b> _____

### **Subrecipient and Vendor Determinations**

The guidance in paragraphs (a) and (b) of this section should be considered in determining whether payments constitute a Federal award or a payment for goods and services.

#### **SUBRECIPIENT (check YES or NO for each statement)**

(b) Federal Award: Characteristics indicative of a Federal award received by a subrecipient are when the organization:

<u>YES</u>	<u>NO</u>	
_____	_____	1. Determines who is eligible to receive what Federal financial assistance.
_____	_____	2. Has its performance measured against whether the objectives of the Federal program are met.
_____	_____	3. Has responsibility for programmatic decision-making.
_____	_____	4. Has responsibility for adherence to applicable Federal program compliance requirements.
_____	_____	5. Uses the Federal funds to carry out a program of the organization as compared to providing goods or services for a program of the pass-through entity.

#### **VENDOR (check YES or NO for each statement)**

(c) Payment for goods and services:

<u>YES</u>	<u>NO</u>	
_____	_____	1. Provides the goods and services within a normal business operation.
_____	_____	2. Provides similar goods and services within normal business operation.
_____	_____	3. Operates in a competitive environment
_____	_____	4. Provides goods or services that are ancillary to the operation of the Federal program
_____	_____	5. Is not subject to compliance requirements of the Federal program.

**There may be unusual circumstances or exceptions to the listed characteristics. In making the determination of whether a subrecipient or vendor relationship exists, the substance of the relationship is more important than the form of the agreement. It is not expected that all of the characteristics will be present and judgment should be used in determining whether an entity is a subrecipient or vendor.**